

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**JANE DOE**

**Plaintiff,**

**v.**

**REGINALD ABRAHAM**

**Defendant.**

**Civil Action No. \_\_\_\_\_**

**(Jury Trial Demanded)**

**COMPLAINT**

Plaintiff Jane Doe<sup>1</sup> (“Plaintiff” or “Ms. Doe”) files this Complaint and demand for a jury trial seeking relief and damages for the sexual abuse, trafficking, and emotional injuries inflicted on her by Defendant Reginald Abraham (“Defendant”). Plaintiff states and alleges the following:

1. Defendant trafficked Ms. Doe to Dracut, Massachusetts, and various locations in Massachusetts, New Hampshire, and Rhode Island for the purpose of engaging in commercial sex acts. In 2015, Defendant enticed Ms. Doe to live with him for the purpose of performing commercial sex acts as part of Defendant’s prostitution ring. Defendant caused, by means of force, threats of force, and coercion, Ms. Doe to engage in commercial sex acts.

2. Defendant took advantage of Ms. Doe’s vulnerabilities as a person who had just left a long relationship, and who was in need of money to support herself and her mother. Defendant did so by enticing Ms. Doe with promises of free lodging and a job, but instead forced her into prostitution, exploited her for profit, and subjected her to brutal abuse, rape, manipulation with drugs, and continuous degradation.

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<sup>1</sup> Concurrent with this Complaint, Plaintiff is filing a Motion To Proceed Under Pseudonym.

3. Ms. Doe is a survivor of human trafficking as defined by the Trafficking Victims Protection Act of 2000 (“TVPA”).

### **JURISDICTION AND VENUE**

4. The Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 18 U.S.C. § 1595(a), as this case presents a federal question arising under the Trafficking Victims Protection Act.

5. Venue is proper pursuant to 28 U.S.C. § 1391(b)(2) because the events giving rise to the claim occurred in this District.

### **PARTIES**

6. Plaintiff Ms. Jane Doe is a citizen of the United States currently residing in Maine. At the time of the events giving rise to her legal claims, Ms. Doe resided in Massachusetts.

7. Upon information and belief, Defendant Reginald Abraham is currently incarcerated at the Federal Correctional Institution in Fairton, New Jersey. His incarceration is the result of his conviction, following a jury trial, on four counts of sex trafficking by force, threats, fraud, or coercion.<sup>2</sup> Defendant committed his acts of sex trafficking in, at least, Malden, Massachusetts and Dracut, Massachusetts.

### **FACTUAL ALLEGATIONS**

#### **The Defendant’s Trafficking Operation**

8. Defendant usually began communicating online with the women he trafficked, convincing them he wanted to be their boyfriend and then luring them to a house from where he conducted his trafficking organization. He operated first out of a house in Malden, Massachusetts

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<sup>2</sup> The related criminal case is *United States v. Abraham*, Case No. 1:17-cr-10269-WGY (D. Mass.), *aff'd* 63 F.4<sup>th</sup> 102 (1st Cir. 2023).

and later out of a house in Dracut, Massachusetts. Once women came to his house, the Defendant would use violence, threats, and the supplying or withholding of drugs to induce and coerce them into engaging in prostitution.

9. Defendant would advertise the women by posting prostitution advertisements online. He chose where the women worked and gave them nightly prostitution quotas. If the women met their quota, he would often reward them with extra drugs. He would beat them and withhold drugs if they failed to meet their quota.

10. Defendant forced the women to follow his rules, which included staying inside his house during the day, turning over all of the money they made, not speaking to other men, and not accessing any social media. He would beat them or withhold drugs if they disobeyed him. As a warning, he made the other women watch when he would beat one of them with whom he was displeased.

11. In structuring his trafficking organization, Defendant would appoint a woman, often a sex worker herself, to serve as the “bottom” in the house. A “bottom” was responsible for tasks such as dressing the women for prostitution “dates,” doling out drugs to the women after Defendant approved the amount, driving women to dates, posting advertisements about the women on Backpage.com, and informing Defendant when any of the women broke his rules.<sup>3</sup>

12. At Defendant’s criminal trial, the jury heard evidence that Defendant had engaged in the sex trafficking of four young women from Maine, including Ms. Doe,<sup>4</sup> by force, fraud, or

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<sup>3</sup> *United States v. Abraham*, 498 F. Supp. 3d 175, 179 (D. Mass. 2020), *aff’d* 63 F.4th 102 (1st Cir. 2023).

<sup>4</sup> The victims were identified by their initials (J.N., K.G., T.B., and E.S.) to protect their identities. See *United States v. Abraham*, 63 F.4th 102, 104 n.1 (1st Cir. 2023).

coercion, from approximately January 2012 through at least August 2016. The jury ultimately found Defendant guilty on each count and his conviction was affirmed on appeal.

**Recruitment and Trafficking of Ms. Doe**

13. Defendant began communicating with Ms. Doe on Facebook in 2015 while she was living with her mother in Maine. At the time, her mother was not working, and her father was in prison. Ms. Doe had just ended a six-year relationship and was, by her testimony in the criminal trial, “[d]esperate,” “lonely,” and “just wanted help.”<sup>5</sup>

14. She eventually agreed to join Defendant at his home, believing she would be his girlfriend and that he could provide her with a job at one of his businesses. Defendant continued to entice her to stay with him, taking her out to eat and bragging about his cars, money, and lavish lifestyle.

15. Defendant drove Ms. Doe to his house, leaving her without a car or other means of transportation. Once there, Ms. Doe realized Defendant used the home as a place to keep women he was coercing into prostitution. Defendant thereafter raped Ms. Doe and forced her to engage in prostitution. He would regularly beat, choke, and slap Ms. Doe and would threaten her with his pit bull. At one point, she witnessed him beat one of the other women so badly that her hair was stained red with blood.

16. Ms. Doe was called by men who had viewed advertisements on Backpage.com that had been posted by Defendant or another woman. She met with the men at their homes or at hotels. She was required, by Defendant, to make \$500 to \$1,000 every night and to give Defendant all the money she earned, with the result being that she had to ask him for money whenever she needed it.

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<sup>5</sup> *Id.* at 105.

17. If Ms. Doe and the other women in the house broke his rules, Defendant beat them or withheld drugs from them to force them into withdrawal. Ms. Doe testified that on one occasion, Defendant forced her into a dog cage in his basement because “[h]e was upset with me and I wasn’t following his rules and he wanted to break me.”<sup>6</sup> On another occasion, he choked Ms. Doe and hit her in the ribs. On yet another occasion, Defendant hit Ms. Doe’s foot with a hammer when she slept too late.

18. Ms. Doe also saw Defendant violently beat other women who lived in the house, including one instance in which he beat a woman so badly that, “[s]he was bleeding everywhere, from her eye, from her nose, and you know, her head in a couple places, and, um, she was saying like she got hit a couple of times, so she was having stomach problems,” and “she could barely walk.”<sup>7</sup> Defendant also showed Ms. Doe and the other women in the house a news report about the death of a woman called “little Ashley” who had been stabbed and burned to death in her car, warning them, “[t]hat’s what happens when you don’t listen.”<sup>8</sup>

19. Defendant gave extra drugs to women who reached their prostitution “quota.” He got Ms. Doe addicted to drugs by giving her oxycodone pills that he claimed were Xanax pills. Defendant would then, at times, force her into withdrawal by denying her the drugs, which was to Ms. Doe extremely painful. Ms. Doe testified that “it feels like you’re dying.”<sup>9</sup>

20. Finally, when Ms. Doe demanded to leave, Defendant put a gun to her head and said, “I’ll kill you right here.” In a remarkable show of courage, Ms. Doe insisted she was leaving, dead or alive. Defendant then brought over other members of his gang, “the Zoe Pound,” and

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<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

subjected her to a weekend of brutal abuse and gang rape. Defendant then put a cigarette out on her face. The wound from the cigarette burn became infected and abscessed, requiring her to go to the hospital. That wound—and the many others—have left scars to this day.

**Long-Term Harm Defendant Inflicted on Ms. Doe**

21. Ms. Doe experienced severe physical, emotional, and psychological trauma because of Defendant's exploitation of her, as well as what she witnessed him do to other women in the house. Ms. Doe has experienced, and continues to experience, symptoms of post-traumatic stress, anxiety, panic attacks, and depression. She also suffers from continuing physical ailments from her trauma, including persistent problems with her foot (from the hammer attack) and back, as well as dental problems and facial scarring that have all required ongoing medical treatment and medications.

22. Defendant continuously inflicted psychological torture on Ms. Doe and the other women in the house, stoking feelings of terror and powerlessness. After the gang rape, Defendant locked Ms. Doe in the house as an example to show the other women what would happen if they tried to leave.

23. Defendant showed Ms. Doe and the other women in the house a news report of a woman who had been stabbed, tied up, and burned to death in her car. Defendant claimed to be responsible for this woman's death, and warned Ms. Doe and the other women that the same thing would happen to them if they disobeyed.

24. In one incident, Defendant took one of the other women into his room, turned on loud music, and beat her so brutally that Ms. Doe could still hear it. Ms. Doe feared for the

woman's life, and said that it sounded "like complete torture, like a woman being beaten to a pulp."<sup>10</sup>

25. Defendant forced Ms. Doe and the other women to introduce him to their families as a boyfriend so he could know where their families lived. Defendant would use that information to threaten Ms. Doe and the other women.

26. Even after Ms. Doe managed to escape Defendant's house, she was still unable to escape Defendant. Defendant made a fake Facebook account under an alias, contacted Ms. Doe, and met her in a hotel and raped her again.

**FIRST CLAIM FOR RELIEF**  
**Sex Trafficking in Violation of the Trafficking Victims Protection Act of**  
**2000, 18 U.S.C. §§ 1591, 1595**

27. Ms. Doe realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

28. At least by recruiting, enticing, harboring, and transporting Ms. Doe from Maine to Massachusetts and within Massachusetts, for the purpose of exploiting Ms. Doe, Defendant engaged in trafficking of Ms. Doe in violation of 18 U.S.C. § 1591(a).

29. On July 24, 2019, Defendant was found guilty by a jury on four counts of sex trafficking by force, threats, fraud, or coercion. One of those counts was trafficking of Ms. Doe. Defendant's conviction was affirmed on appeal.

30. Ms. Doe is permitted to bring a civil cause of action under 18 U.S.C. § 1595.

31. As a direct and proximate result of Defendant's actions, Ms. Doe has sustained damages including medical expenses, emotional distress, and economic losses.

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<sup>10</sup> *United States v. Abraham*, Case No. 1:17cr10269-WGY, Trial Tr. at 129:16-19 (ECF No. 240) (D. Mass. July 19, 2019).

32. Ms. Doe is therefore entitled to recover damages in an amount to be proven at trial, including attorneys' fees and other relief that the Court may deem proper.

**WHEREFORE**, Plaintiff respectfully requests that judgment be granted as follows:

- (a) Money damages for each claim for relief;
- (b) Punitive and exemplary damages according to proof;
- (c) Attorneys' fees and costs for Plaintiff against the Defendant; and
- (d) Such other further relief as the Court may deem just and proper.

Plaintiff demands a trial by jury.

Dated: September 20, 2024

Respectfully submitted,

By: /s/ Eda Stark

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